

**MIIT of China response to**  
**the Further Notice of Inquiry on the IANA Functions**

We noted that the current contract signed between the US Department of Commerce and ICANN on the IANA functions will expire in September, 2011. It is a matter that has attracted a lot of concerns from all parties, because the IANA functions are closely linked to the management of the Internet critical resources, which include not only services related to the .ARPA and .INT top-level domain(TLD) management, the coordination of the assignment of technical Internet protocol parameters and the allocation of Internet numbering resources like IP address, but also the root zone management of the Internet domain name system (DNS).

We believe that an international management system of Internet critical resources should be established in line with the governments' and public interests, based on the global principles of "multilateral, democratic and transparent" as defined by WSIS in relation to Internet governance. The Internet critical resources should be governed within the framework of international laws in order to ensure security and stability of Internet.

Therefore, we would like to offer our comments on the IANA functions

as follows:

I. A multilateral, democratic and transparent management system of Internet critical resources and an international legal framework and principle on the management of these resources need to be established, so that all countries can equally participate in the management of Internet critical resources.

II. The operator of IANA functions, in cooperation with all stakeholders, needs to establish a well-defined procedure, a regular reporting and information releasing mechanism for root zone management,. Meanwhile, the performance reports and the survey and audit results should be published globally in the six UN working languages. Opinions from different stakeholders including the governments must be solicited regarding the operation management of IANA functions. Besides, the operation management of IANA functions should be subject to the supervision of all parties, including governments, social groups, technical organizations and all internet customers. We are of the view that the improvement of transparency and accountability of IANA functions would enhance the confidence of global Internet community and ensure security and stability of the Internet.

III. As ccTLD management is the internal affair of all countries or regions, one country or region should not interfere with the activities of other countries or regions in administrating the local ccTLD registry by law. The gTLD registry should follow the laws of the countries or regions where it is located. Meanwhile, the cross-border operated TLDs should be in conformity with the laws, rules and regulations of the countries or regions where the services of domain registration are provided.

In addition, we noted that the section C.2.2.1.3.2 of the draft SOW requires the IANA functions operator to “act in accordance with the relevant national laws of the jurisdiction which the TLD registry serves” and “include documentation to demonstrate how the proposed string has received consensus support from relevant stakeholders and is supported by the global public interest” for delegation requests for new gTLD, and we hope that the NTIA could provide further elaborations in this respect.